

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

WILLIAM J. WAGNER,

Plaintiff,

-vs-

CHIARI & ILECKI, LLP,

Defendant.

**NOTICE OF CROSS-MOTION
FOR SUMMARY JUDGMENT**

Docket No. 15-cv-633-FPG

MOTION MADE BY:

Defendant, CHIARI & ILECKI, LLP, by its attorneys,
CONNORS LLP.

**DATE, TIME, & PLACE
OF HEARING:**

On a date and time specified by the Court, before the
Hon. Frank P. Geraci, Jr., in the United States
District Court for the Western District of New York,
at 100 State Street, Rochester, New York 14614.
Oral argument is requested.

SUPPORTING PAPERS:

Declaration of Paul A. Woodard, Esq., with exhibits;
Declaration of William Ilecki, Esq.; Declaration of
Melissa Overbeck, Esq., with exhibits; Declaration of
Karen Sandford, with exhibits; Declaration of
Kristian Brown, with exhibit; Statement of Material
Undisputed Facts; Response to Plaintiff's Statement
of Undisputed Facts; Memorandum of Law;
defendant's papers submitted in opposition to
plaintiff's motion in limine (Doc. 19); and all other
papers and proceedings in this action.

**RELIEF REQUESTED &
GROUNDS FOR RELIEF:**

An Order of this Court granting defendant summary
judgment on each of plaintiff's claims and dismissing
this action in its entirety, with prejudice, pursuant to
Rule 56 of the Federal Rules of Civil Procedure.

REPLY PAPERS:

Defendant intends to file and serve reply papers.

DATED: Buffalo, New York
March 2, 2017

s/Paul A. Woodard
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